

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PARKING WORLD WIDE LLC,
A Missouri Limited Liability Company,

Plaintiff,

vs.

CITY OF SAN FRANCISCO,
A California Municipality,

Defendant,

and

SERCO GROUP Plc,
A British Company based in Hampshire

Defendant,

and

ORACLE,
A Delaware Corporation,

Defendant,

and

PARKINGCARMA,
A Delaware Corporation,

Defendant,

and

City of Clayton, Missouri,
A Missouri Municipality,

Defendant,

and

Passport Labs, Inc.,
A North Carolina Corporation,

Defendant.

Case No.

JURY TRIAL DEMANDED

COMPLAINT

- 1) That Plaintiff is a single member Missouri Limited Liability Company with the member being a citizen of the State of Missouri.
- 2) That the City of San Francisco is a municipality in the State of California and citizen of the State of California.
- 3) That Servco Group Plc is a company with its domicile in England and is a citizen of a foreign country.
- 4) That Oracle is a corporation that is incorporated in the State of Delaware.
- 5) That Parking Carma is a corporation that is incorporated in the State of Delaware.
- 6) That the City of Clayton is a Missouri municipality.
- 7) That Passport Labs, Inc. is a corporation that is incorporated in the State of North Carolina.
- 8) Venue is proper in this court as the patented method in question was developed in this district and patented while in this district. 35 USC § 1338.

COUNT I
DIRECT PATENT INFRINGEMENT

- 9) That on or about October 8, 2019, Plaintiff was awarded Patent US 10,438,421 B2 (“Patent”).
- 10) The Patented method is a parking status system that overlays images of a street, a lot, or a garage with representations of parked vehicles the status of any parking space shown in the image and uses same for enforcement of parking laws.
- 11) The Patented method transforms parking space, payment, and subscriber data into parking space status shown in real time to a user.

12) Claim 1 of the Patent includes, inter alia, assembling a database upon a computer of parking spaced including their geographic locations and updating a database upon a computer of subscribers.

13) Claim 5 of the Patent includes, inter alia, assembling a database upon a computer of parking spaced including their geographic locations and updating a database upon a computer of subscribers.

14) The City of San Francisco through the San Francisco Municipal Transportation Agency (“SFMTA”) infringes on Plaintiff’s Patent by using demand responsive pricing and SFPark parking control software with a database of metered parking spaces that copies Plaintiff’s patented method and as such is an infringement of patent pursuant to 35 U.S.C. § 271(a).

15) That pursuant to a letter produced by the SFMTA dated November 23, 2020 if SFMTA has infringed on any patent claim and/or intellectual property infringement Serco provided intellectual property a portion of some and/or of such intellectual property and as such contributed to the infringement of patent pursuant to 35 U.S.C. § 271(a).

16) That pursuant to a letter produced by the SFMTA dated November 23, 2020 if SFMTA has infringed on any patent claim and/or intellectual property infringement Oracle provided intellectual property a portion of some and/or of such intellectual property and as such contributed to the infringement of patent pursuant to 35 U.S.C. § 271(a).

17) That pursuant to a letter produced by the SFMTA dated November 23, 2020 if SFMTA has infringed on any patent claim and/or intellectual property infringement ParkingCarma provided intellectual property a portion of some and/or of such intellectual

property and as such contributed to the infringement of patent pursuant to 35 U.S.C. § 271(a).

18) Upon information and belief Serco has and is infringing upon Plaintiff's patent in other jurisdictions in the United States and most likely, in the State of Missouri and as such is an infringement of patent pursuant to 35 U.S.C. § 271(a).

19) Upon information and belief Oracle has and is infringing upon Plaintiff's patent in other jurisdictions in the United States and most likely, in the State of Missouri and as such is an infringement of patent pursuant to 35 U.S.C. § 271(a).

20) Upon information and belief ParkingCarma has and is infringing upon Plaintiff's patent in other jurisdictions in the United States and most likely, in the State of Missouri and as such is an infringement of patent pursuant to 35 U.S.C. § 271(a).

21) The actions of said Defendants have caused and are causing Plaintiff to suffer monetary damages.

22) Further actions by Defendants will cause continued harm to Plaintiff and as such must be ordered to immediately stop infringing on Plaintiff's patent.

WHEREFORE, Plaintiff moves for a judgment in its favor and against Defendants in proportion of damages caused to Plaintiff, an Order demanding that Defendants cease infringing on Plaintiff's patent and enter any other Orders this Court deems necessary and proper.

COUNT II
DIRECT PATENT INFRINGEMENT

23) That on or about October 8, 2019, Plaintiff was awarded Patent US 10,438,421 B2 ("Patent").

24) The Patented method is a parking status system that overlays images of a street, a lot, or a garage with representations of parked vehicles the status of any parking space shown in the image and uses same for enforcement of parking laws.

25) The Patented method transforms parking space, payment, and subscriber data into parking space status shown in real time to a user.

26) Claim 1 of the Patent includes, inter alia, assembling a database upon a computer of parking spaced including their geographic locations and updating a database upon a computer of subscribers.

27) Claim 5 of the Patent includes, inter alia, assembling a database upon a computer of parking spaced including their geographic locations and updating a database upon a computer of subscribers.

28) The City of Clayton, Missouri infringes on Plaintiff's Patent by using demand responsive pricing and SFPark parking control software with a database of metered parking spaces that copies Plaintiff's patented method and as such is an infringement of patent pursuant to 35 U.S.C. § 271(a).

29) Upon information and belief, Passport Labs, Inc. provided intellectual property and a portion of some and/or of such intellectual property and as such contributed to the infringement of patent pursuant to 35 U.S.C. § 271(a).

30) Upon information and belief Passport Labs, Inc. has and is infringing upon Plaintiff's patent in other jurisdictions in the United States and most likely, in the State of Missouri and as such is an infringement of patent pursuant to 35 U.S.C. § 271(a).

31) The actions of said Defendants have caused and are causing Plaintiff to suffer monetary damages.

32) Further actions by Defendants will cause continued harm to Plaintiff and as such must be ordered to immediately stop infringing on Plaintiff's patent.

WHEREFORE, Plaintiff moves for a judgment in its favor and against Defendants in proportion of damages caused to Plaintiff, an Order demanding that Defendants cease infringing on Plaintiff's patent and enter any other Orders this Court deems necessary and proper.

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